REMARKS

Claims 1, 2, 9 and 22 are all of the claims presently pending in the present Application. Applicants have canceled claims 8, 10-13, 21, and 23 without prejudice or disclaimer. Applicants have amended claims 1, 2, 9, and 22 to define the claimed invention more particularly.

Applicants believe that entry of the claim amendments is proper as the amendments to the claims do not raise new issues, which would require further consideration and/or search.

It is noted that the claim amendments are made only for more particularly pointing out the invention, and not for distinguishing the invention over the prior art, narrowing the claims or for any statutory requirements of patentability. Further, Applicants specifically state that no amendment to any claim herein should be construed as a disclaimer of any interest in or right to an equivalent of any element or feature of the amended claim.

Claims 1, 2 and 11-13 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over JP 60-32367 (hereinafter "JP '367") in view of Heller (U.S. Patent No. 4, 085,867) and further in view of Polan (U.S. 6,158,620). Claims 8 and 21 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over JP '367 in view of Heller and Polan and further in view of Hoffman, et al. (U.S. Patent Application Publication No. 2002/0157964; hereinafter "Hoffman"). Claims 9 and 22 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over JP '367 in view of Heller, Polan and Hoffman and further in view of Akio (U.S. Patent No. 3,150,012). Claims 10 and 23 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over JP '367 in view of Heller, Polan, Hoffman, and Akio and further in view of Orphadt (U.S. Patent No. 6,875,539).

Applicants respectfully traverse these rejections in the following discussion.

I. THE CLAIMED INVENTION

The claimed invention (e.g., as defined by exemplary claim 1) is directed to a torch with integrated electrolytic action for the surface treatment of metals.

The torch includes a peak-paddle connected with the unipolar electric current supply from an external apparatus, the other pole being connected with the metal surface being treated, in which an electrolytic solution used for the treatment is arranged in a tank connected to the torch to supply the peak-paddle through channels inside the torch, and the electrolytic solution is put under pressure in a delivery direction through a metering device of the solution controlled by the user. The torch includes as a device for controlling a delivery of the electrolytic solution, a manual pump realized with a flexible zone of a shell of the torch, arranged in on any part of supply ducts, the pump comprising a first non-return valve arranged upstream and a second non-return valve arranged downstream of the flexible zone of the shell. The shell includes a handgrip shaped to include rigidifying zones and zones with concentrated flexibility. The shell is shaped to include a chamber at the second non-return valve and at the flexible zone of the shell. The shell is shaped to include preferential sealing zones between an inside of the shell and the metallic body, through annular seats on the metallic body and corresponding annular inner edges in the shell, to form a seal on the chamber. The metallic body includes an axial hole connected to the chamber and ending at the first non-return valve. The tank is removably connected to the torch and comprises a semi-rigid or flexible casing for re-entry of air after spraying or suction of

the electrolytic solution worked by a user.

Furthermore, a torch (e.g., as defined by exemplary claim 2) includes a peak-paddle connected with the unipolar electric current supply from an external apparatus, the other pole being connected with the metal surface being treated, in which an electrolytic solution used for the treatment is arranged in a tank connected to the torch to supply the peak-paddle through channels inside the torch, and the electrolytic solution is put under pressure in a delivery direction through a metering device of the solution controlled by the user. The torch further includes, as a device for controlling a delivery of the electrolytic solution, a manual pump realized with a flexible zone of a shell of the torch, arranged in on any part of supply ducts, the pump comprising a first non-return valve arranged upstream and a second non-return valve arranged downstream of the flexible zone of the shell. The shell includes a handgrip shaped to include rigidifying zones and zones with concentrated flexibility. The shell is shaped to include a chamber at the second non-return valve and at the flexible zone of the shell. The shell is shaped to include preferential sealing zones between an inside of the shell and the metallic body, through annular grooves on an outside of the shell for an application of a belt and locking rings of the shell, to complete a seal on the chamber. The metallic body includes an axial hole connected to the chamber and ending at the first non-return valve. The tank is removably connected to the torch and comprises a semi-rigid or flexible casing for re-entry of air after spraying or suction of the electrolytic solution worked by a user.

Accordingly, the claimed invention is capable of applying electrolytic pickling, polishing, and/or cleaning action in an integrated manner with the same device, which can also be used to

carry out the writing and the electrodepositing.

II. THE PRIOR ART REJECTIONS

A. The Alleged Combination of JP '367, Heller and Polan

The Examiner alleges that one of ordinary skill in the art would have combined Polan and Heller with JP '367 to render obvious the claimed invention of claims 1, 2 and 11-13. Applicants respectfully submit, however, that, even if combined, the alleged combination of references does not teach or suggest each and every feature of the claimed invention.

That is, the alleged combination of references does not teach or suggest, "*wherein the shell is shaped to include preferential sealing zones between an inside of the shell and a metallic body, through annular seats on the metallic body and corresponding annular inner edges in the shell, to form a seal on said chamber, wherein the metallic body includes an axial hole connected to said chamber and ending at the first non-return valve, and wherein said tank is removably connected to said torch and comprises a semi-rigid or flexible casing for re-entry of air after spraying or suction of the electrolytic solution worked by a user*", as recited in exemplary independent claim 1 and similarly recited in exemplary independent claim 2.

None of the applied references teaches or suggests a metallic body and an external shell surrounding the body. JP '367 includes a body and a piston pump combined in a single part. The external shell is not present. Thus, it is not possible to add a shell on the device of JP '367 (e.g., as illustrated in Figure 7) to make a plain combination as asserted by the Examiner.

Moreover, Heller and Polan disclose two different ways to make a tank with delivery

capacity, but neither one teaches or suggests positioning a metallic body into the tank (i.e., "flexible or collapsible" container). Furthermore, neither Heller nor Polan teaches or suggests that the shell (i.e., container) is clamped on the metallic body in two different ways (rigidifying zones or belt and locking rings).

According to the claimed invention, a shell may be tightened on the metallic body to define a chamber with a collapsible wall to work like a reciprocating pump when pressed by the hand of the user.

Heller discloses a container that works in vertical direction only. The torch of the claimed invention works in any direction, contrary to the gravity also. Thus, the teaching of Heller and Polan cannot be combined with the teachings of JP '367.

None of the applied references, taken alone or in combination, teach or suggest positioning a first part (i.e., the metallic body) into the other part (i.e., the shell) and clamping it to the first part on a specific section to define a "flexible zone" to pump the electrolyte through the first part.

In view of the above, Applicants respectfully request the Examiner to reconsider and withdraw this rejection.

B. The Alleged Combination of JP '367, Heller, Polan and Hoffman

The Examiner alleges that one of ordinary skill in the art would have combined Hoffman and Heller with JP '367 to teach the claimed invention of claim 8 and 21.

Applicants have canceled claims 8 and 21, thus rendering the Examiner's rejection moot.

Moreover, Applicants note that Hoffman discloses an electropolishing apparatus for large parts and references a large device with a large pumping capability (i.e., in one minute it can pump about 100 gallons of electrolytic solution; pressure until 150 p.s.i.). The teachings of Hoffman, however, cannot be used to define a small device like the claimed torch, which is used in any direction by hand and not in a standing position only.

Therefore, Applicants respectfully request the Examiner to reconsider and withdraw this rejection.

C. The Alleged Combination of JP '367, Heller, Polan, Hoffman, and Akio

The Examiner alleges that one of ordinary skill in the art would have combined Hoffman, Akio, and Heller with JP '367 to teach the claimed invention of claims 9 and 22. Applicants respectfully submit, however, that, even if combined, the alleged combination of references does not teach or suggest each and every feature of the claimed invention.

That is, claims 9 and 22 are allowable at least based on analogous reasons to those set forth above with respect to claims 1 and 2.

Therefore, Applicants respectfully request the Examiner to reconsider and withdraw this rejection.

D. The Alleged Combination of JP '367, Heller, Hoffman, Akio, and Orphadt

The Examiner alleges that one of ordinary skill in the art would have combined Hoffman, Akio, Orphadt, and Heller with JP '367 to teach the claimed invention of claims 10 and 23.

Applicants have canceled claims 10 and 23, thus rendering the Examiner's rejection moot.

Moreover, Applicants note that Orphadt does not teach or suggest a metallic body and shell clamped to the metallic body.

Therefore, Applicants respectfully request the Examiner to reconsider and withdraw this rejection.

III. FORMAL MATTERS AND CONCLUSION

In view of the foregoing, Applicants submit that claims 1, 2, 9 and 22, all of the claims presently pending in the application, are patentably distinct over the prior art of record and are in condition for allowance. Applicants respectfully request the Examiner to pass the above application to issue at the earliest possible time.

Should the Examiner find the application to be other than in condition for allowance, Applicants request the Examiner to contact the undersigned at the local telephone number listed below to discuss any other changes deemed necessary in a telephonic or personal interview.

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The undersigned hereby authorizes the Commissioner to charge any deficiency in fees or to credit any overpayment in fees to Attorney's Deposit Account No. 50-0481.

Respectfully Submitted,

Date: August 8, 2011

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FACSIMILE TRANSMISSION

I hereby certify that I am filing this paper via facsimile, to Group Art Unit 1723, at (571) 273-8300, on August 8, 2011.

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